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1850 K Street NW
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Oct 31 2002

Comments on proposed new Specification for Exit signs.

Dear Ms Hoffmeyer,

I am sorry for the lateness of these comments, I understood that Greg Steinman was replying on behalf of T & B.

I attended the NEMA meeting on Oct.17 during which we discussed the revised specification and other related issues.

On most points we had agreement between the manufacturers, but we did have a couple of points where we did not reach a concensus.

This letter represents my company's views.

1. The exit sign definition includes the words, " must have a legally required legend that is illuminated by an INTEGRAL light source ....."

From reading the comments of the proponents of photoluminescent signs, this requirement is being ignored and confused by stating that a photoluminescent exit sign consumes zero energy.

This requirement should remain as there is little control over an installation, where an adjacent fluorescent luminaire is claimed to meet the charging requirements of the sign.

I would like to see an additional sentence at the end of your definition, " The sign, except for the power source, shall be a stand-alone unit. The power source for the emergency mode may be integral or remote"

2. 3) A, pages 2 & 3 require a statement. The proposal is a suggested statement on deterioration of light output, but you are prepared to accept alternates. I am not in favour of different statements from different manufacturers because this can lead to exaggerated claims and sales competitiveness. I propose that EPA requires a specific statement as follows:

" The light source in this exit sign will depreciate with time which can lead to visibility and legibility that is below the current Life Safety Code requirements. The light source, (lamps), should be replaced at regular intervals to assure safety and visibility in the event of an emergency."

I would have liked to have put in a specific time, but there are too many variables for this to be practical.

3. The proposed change to 3 watts or less per sign is not acceptable. Many currently submitted signs meet this, but in order to meet the requirements capacitive inputs are often used and light outputs are set to meet the luminance performance at the time of testing and not with a 5 year or more timescale in mind. I have previously proposed 5 watts per sign, and the change to 3 watts would have very little impact on the electrical load of a building, but could have significant effects on the safety and reliability of the signs.

4. The Power Factor requirements are not practical unless you intend that no capacitive input signs may be Energy Star listed. I could accept 0.2 leading and 0.7 lagging, although both numbers are difficult to meet.

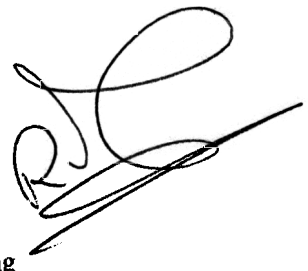
5. We support the Contrast and Luminance requirements as necessary to provide a quality safe sign. We agree that it should ALSO be UL listed to UL 924. Currently a sign can be listed to UL 924 with no minimum light output measurement.

6. For the document to be useable, you must define the relevant issue of UL 924. It should be the 8th Edition with the updates including those of July 11 2002.

7. I cannot comment adequately on the test procedure until I see your new Qualified Product Information form. We currently test and provide more data than you publish, such as the performance in the emergency mode, initially and at the end of 90 minutes.

8. With the comments you are receiving and the interaction with industry when this stage is complete, Jan 1 2003 is not an acceptable Effective date. I would like to see 1 year from publication of the new requirements.

Yours sincerely,



Ron H. Minter
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